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Attorneys for Defendant,
MUHLHAUSER STEEL, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

THE TRAVELERS INDEMNITY
COMPANY OF CONNECTICUT, a
Connecticut Corporation,

Plaintiff,

v.

MULHAUSER STEEL, INC., a
California Corporation; ANGELES
CONTRACTOR, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 8:24-cv-01913-FMO-ADS

**NOTICE OF MOTION AND
MOTION TO STAY**

Hearing Date: February 27, 2025
Hearing Time: 10:00 a.m.
Courtroom 6D

Filed concurrently with:

1. *Memorandum of Points & Authorities;*
2. *Declaration of Paul C. Hirst;*
3. *Request for Judicial Notice; and*
4. *[Proposed] Order.*

1 TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

2 YOU ARE HEREBY NOTIFIED THAT on February 27, 2025, at 10:00 a.m., or
3 as soon thereafter as this matter may be heard, in Courtroom 6D of the above-entitled
4 court, located at 350 W. 1st Street, 6th Floor, Los Angeles, California 90012, defendant
5 Muhlhauser Steel, Inc. (“Muhlhauser”), through its attorneys of record herein, will and
6 hereby do move this court as follows:

7 For an order staying the instant insurance coverage action until resolution of the
8 underlying third-party claims asserted against Muhlhauser in the lawsuit styled *Angeles*
9 *Contractor, Inc. v. Muhlhauser Steel, Inc., et al.*, pending in Orange County Superior
10 Court, case no. 30-2021-01211990-CU-BC-CJC.

11 Said motion will be based upon this Notice of Motion and Motion, as well as the
12 Memorandum of Points and Authorities, the Declaration of Paul C. Hirst, and the
13 Request for Judicial Notice filed concurrently herewith, as well as the complete files
14 and records in this action, and upon all other matters upon which this court may take
15 judicial notice.

16 This motion is made following a conference of counsel pursuant to L. R. 7-3
17 which took place on October 8, 2024.

18 DATED: January 22, 2025

McLEOD LAW GROUP, A.P.C.

19 By: /s/Paul C. Hirst

20 JOHN J. McLEOD

21 PAUL C. HIRST

22 Attorneys for Defendant, MUHLHAUSER
STEEL, INC.

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